

STATE OF SOUTH CAROLINA

(Caption of Case)

South Carolina Electric & Gas Co. Application for
Mid-Year Adjustment in Two Phases of the Base
Rates Charged by SCE&G for the Recovery of the
Fuel Costs Associated with its Service to Retail
Electric Customers

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2008 - 302 - E

(Please type or print)

Submitted by: Scott ElliottSC Bar Number: 1872Address: 721 Olive StreetTelephone: 803-771-0555Columbia, SC 29205Fax: 803-771-8010

Other: _____

Email: sellott@elliottlaw.us

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

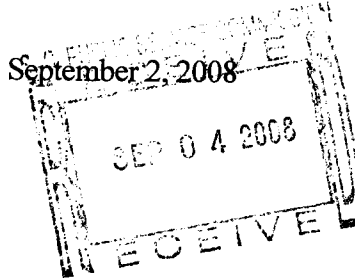
- ☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously
- ☐ Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificatio
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigator
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

ELLIOTT & ELLIOTT, P.A.
ATTORNEYS AT LAW
721 OLIVE STREET
COLUMBIA, SOUTH CAROLINA 29205
selliott@elliottlaw.us

SCOTT ELLIOTT

TELEPHONE (803) 771-0555
FACSIMILE (803) 771-8010



Mr. Charles L.A. Terreni
Chief Clerk of the Commission
SC Public Service Commission
P. O. Drawer 11649
Columbia, SC 29211

RE: Application of South Carolina Electric & Gas Company for Mid-Period
Adjustment in Two Phases of Base Rates Charged by South Carolina
Electric and Gas Company for the Recover of Fuel Costs Associated
with Its Service to Retail Electric Customers
Docket No. 2008-302-E

Dear Mr. Terreni:

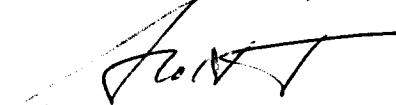
Enclosed please find for filing an original and one (1) copy of the South Carolina Energy Users Committee's First Set of Interrogatories to SCE&G and First Set of Request to Produce to SCE&G, together with a Certificate of Service in the above-captioned matter.

I have enclosed an extra copy of these Interrogatories and Request to Produce which I would ask you to date stamp and return to me in the self-addressed, stamped envelope provided for your convenience. By copy of this letter, I am serving all parties of record.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me. Thank you.

Sincerely,

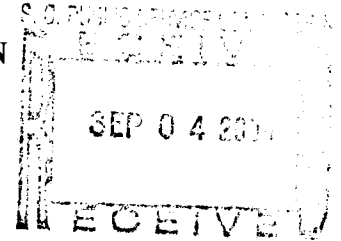
ELLIOTT & ELLIOTT, P.A.



Scott Elliott

SE/jcl
Enclosures
cc: Parties of record w/enclosures

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2008-302-E



IN THE MATTER OF:)

)
South Carolina Electric & Gas Company)
Application for Mid-Period Adjustment in)
Two Phases of the Base Rates Charged by)
SCE&G for the Recovery of the Fuel Costs)
Associated with Its Service to Retail)
Electric Customers)

**SCEUC's FIRST SET OF
INTERROGATORIES
TO SCE&G**

TO: SOUTH CAROLINA ELECTRIC & GAS COMPANY AND ITS ATTORNEY, K.
CHAD BURGESS, ESQUIRE:

In accordance with S.C. Code Ann. Reg. R.103-833, Intervenor, the South Carolina Energy Users Committee ("SCEUC" or "Intervenor") requests the Applicant, South Carolina Electric & Gas Company ("SCE&G" or "the Company") answer the following interrogatories within twenty (20) days from the date of service, under oath, through the individual officers, managing agents, employees, members or representatives who are most knowledgeable with respect to the subject to which each respective interrogatory is addressed.

INSTRUCTIONS

The Intervenor requests the Company to serve its responses upon the Intervenor's undersigned counsel not later than twenty (20) days after the service hereof. The interrogatories are to be deemed to be of a continuing nature so as to require supplementation and amendment promptly, as necessary, in order to comport with facts and information that is known or available to you at the time of the initial responses of

these interrogatories. The responses to these interrogatories should be provided to the Intervenor by delivery to the undersigned at 721 Olive Street, Columbia, South Carolina 29205.

If the Company claims a privilege as to any interrogatory, with respect thereto, set forth the following:

1. Who possesses any requested document;
2. Who has reviewed any requested document;
3. The author, recipient and any copyholders of any requested documents;
4. The parties to any covered conversation, if it is a recording or transcript;
5. Who prepared the requested document;
6. The date of the requested document;
7. The type of document; and
8. The type of privilege asserted.

DEFINITIONS

A. As used herein, the term "Document" is used in the broadest sense and includes, but is not limited to, any written, printed, recorded, typed or graphic matter, however produced or reproduced, including all non-identical copies thereof and further including, but not limited to, any books, ledgers, pamphlets, periodicals, brochures, letters, memoranda, advertisements, proposals, telegrams, telexes, reports, telephone logs, drafts, business records, handwritten notes, bills, checks, invoices, charts, graphs, indices, tapes, transcripts, data sheets, records of telephone calls, data processing cards, and electronically-stored data such as documents stored on network drives, hard drive, cd-rom optical disks, magnetic tape, 3.5 in and 5.25 inch floppy disks, electronic mail files, both

current and deleted, and any other computer files of whatever type which are in Utility possession, custody or control.

B. As used herein, the words “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and this request any documents which might otherwise be construed to be outside its scope.

C. Wherever applicable, the singular form of a word should be interpreted as plural.

D. As used herein, the word “you” or “your” means or refers to Utility, its agents, consultants, or any member, officer or other representative of Utility.

E. As used herein, the word “identify” means provision of dates, times, places, and parties to any oral communication. With respect to any other communication, it means the date, length and medium of communication or document. With respect to any person(s), it means name, title, address and telephone number.

INTERROGATORIES

SCEUC 1-1. Please provide the Company’s forecast of the cost of coal for the period May 1, 2008 through April 30, 2009, made and/or advanced in the Company’s March 2008 fuel proceeding. In so doing, set out the Company’s forecast of the unit cost of coal and the Company’s forecast of the amount (in tons) of the coal necessary to meet the Company’s needs during the forecast period. (e.g. forecasted cost of \$1 per ton forecasting the need for 1 million tons).

SCEUC 1-2. Please provide the Company’s forecast of the cost of coal for the period November 1, 2008 through April 30, 2009, made and/or advanced in the Company’s 2008

mid period fuel proceeding filed August 5, 2008. In so doing, set out the Company's forecast of the unit cost of coal and the Company's forecast of the amount (in tons) of the coal necessary to meet the Company's needs during the forecast period. (e.g. forecasted cost of \$1 per ton forecasting the need for 1 million tons).

SCEUC 1-3. Please provide the Company's forecast of the cost of natural gas for the period May 1, 2008 through April 30, 2009, made and/or advanced in the Company's March 2008 fuel proceeding. In so doing, set out the Company's forecast of the unit cost of natural gas and the Company's forecast of the amount (in dts) of the natural gas necessary to meet the Company's needs during the forecast period. (e.g. forecasted cost of \$1 per dt forecasting the need for 1 million dts).

SCEUC 1-4. Please provide the Company's forecast of the cost of natural gas for the period November 1, 2008 through April 30, 2009, made and/or advanced in the Company's 2008 mid period fuel proceeding filed August 5, 2008. In so doing, set out the Company's forecast of the unit cost of natural gas and the Company's forecast of the amount (in dts) of the natural gas necessary to meet the Company's needs during the forecast period. (e.g. forecasted cost of \$1 per dt forecasting the need for 1 million dts).

SCEUC 1-5. Please provide the Company's forecast of the cost of nuclear fuel for the period May 1, 2008 through April 30, 2009, made and/or advanced in the Company's March 2008 fuel proceeding. In so doing, set out the Company's forecast of the unit cost of nuclear fuel and the Company's forecast of the amount (in pounds) of the nuclear fuel necessary to meet the Company's needs during the forecast period. (e.g. forecasted cost of \$1 per pound forecasting the need for 1 million pounds).

SCEUC 1-6. Please provide the Company's forecast of the cost of nuclear fuel for the period November 1, 2008 through April 30, 2009, made and/or advanced in the Company's 2008 mid period fuel proceeding filed August 5, 2008. In so doing, set out the Company's forecast of the unit cost of nuclear fuel and the Company's forecast of the amount (in pounds) of the nuclear fuel necessary to meet the Company's needs during the forecast period. (e.g. forecasted cost of \$1 per pound forecasting the need for 1 million pounds).

SCEUC 1-7. Please provide the Company's forecast of the cost of oil for the period May 1, 2008 through April 30, 2009, made and/or advanced in the Company's March 2008 fuel proceeding. In so doing, set out the Company's forecast of the unit cost of oil and the Company's forecast of the amount (in gallons) of the oil necessary to meet the Company's needs during the forecast period. (e.g. forecasted cost of \$1 per gallon forecasting the need for 1 million gallons).

SCEUC 1-8. Please provide the Company's forecast of the cost of oil for the period November 1, 2008 through April 30, 2009, made and/or advanced in the Company's 2008 mid period fuel proceeding filed August 5, 2008. In so doing, set out the Company's forecast of the unit cost of oil and the Company's forecast of the amount (in gallons) of the oil necessary to meet the Company's needs during the forecast period. (e.g. forecasted cost of \$1 per gallon forecasting the need for 1 million gallons).

SCEUC 1.9 On a monthly basis, please provide the under-collection/over-collection experienced to-date. Please break this under-collection/over-collection into fuel components and provide the monthly realized fuel cost, in per unit terms, and the associated fuel consumption.

SCEUC 1.10 Assuming the Commission does not accept the Company's request to change its fuel factor during the current proceeding, please provide the monthly under-collection/over-collection forecast through April 30, 2009, again broken down by fuel component.

SCEUC 1.11 Please provide monthly generation output figures for the test year to date for all generation plants owned or operated by the Company for service to South Carolina consumers. To the extent that a generating facility unexpectedly (e.g. non-maintenance issues) went off-line, please explain the reason for this outage, the time of the outage, and what steps the Company took to place the generator back on-line.

SCEUC 1.12 Please provide a detailed summary of all purchased power costs incurred by the Company in the test period to date. Please be as specific as possible and provide the purchased power costs in terms of capacity costs, fuel costs, transmission costs, etc.

SCEUC 1.13 Please provide a breakdown of any cost increase, both in dollar and percentage terms, for the typical residential, commercial and industrial consumer. As part of this request, please identify all workpapers used in developing the above-stated cost increases.

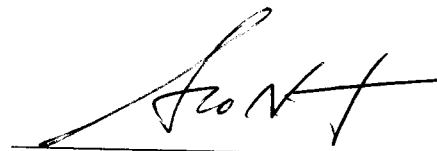
SCEUC 1.14 Please provide a detailed list of all wholesale sales made by the Company during test period to date. Please include in this list the MWHs sold to the supplier, and the total cost paid by each supplier. Please specifically list whether any sale was made on a native load priority basis and please state whether the sale of power was based on incremental cost or system average costs. SCEUC does not need to know the names of the suppliers and would prefer that the purchasers be labeled as Buyer A, Buyer B, Buyer C, etc. Utility is also free to take whatever other confidentiality measures that it so desires

with this request for information. Please also describe how Utility accounts for the sale of all off-system power on its regulated books.

SCEUC 1.15 Please explain in detail all hedging strategies that the Company uses in procuring natural gas, coal, and electricity supplemental purchases.

SCUEC 1.16 Please provide actual fuel costs for each month for the past five calendar years.

SCEUC 1.17 Please identify the financial model and associated worksheets used to develop the requested fuel factor in this proceeding.

A handwritten signature in black ink, appearing to read "Scott Elliott", is written over a horizontal line.

Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205
803-771-0555
803-771-8010

Attorney for South Carolina Energy
Users Committee

Columbia, SC

September 2, 2008

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: South Carolina Electric & Gas Company Application for
Mid-Period Adjustment in Two Phases of the Base Rates
Charged by SCE&G for the Recovery of the Fuel Costs
Associated with Its Service to Retail Electric Customers

DOCKET NO.: 2008-302-E

PARTIES SERVED: Nanette S. Edwards, Esquire
Office of Regulatory Staff
P. O. Box 11263
Columbia, SC 29201

Shannon Bowyer Hudson, Esquire
Office of Regulatory Staff
P. O. Box 11263
Columbia, SC 29201

K. Chad Burgess, Esquire
Willoughby & Hoefer, P.A.
1426 Main Street,
Mail Code 130
Columbia, SC 29201

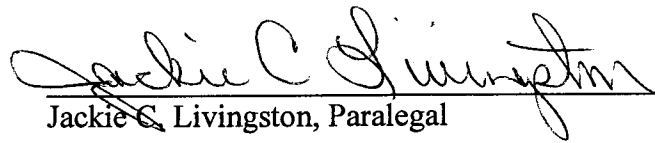
Damon E. Xenopoulos, Esquire
Brickfield Burchette Ritts &
Stone, PC
1025 Thomas Jefferson St., NW
8th Floor, West Tower
Washington, DC 20007

E. Wade Mullins, III, Esquire
Bruner Powell Robbins Wall &
Mullins, LLC
P. O. Box 61110
Columbia, SC 29260

PLEADING:

SCEUC's FIRST SET OF INTERROGATORIES
TO SCE&G

September 2, 2008


Jackie C. Livingston, Paralegal

IN THE MATTER OF:)
)
South Carolina Electric & Gas Company)
Application for Mid-Period Adjustment in)
Two Phases of the Base Rates Charged by)
SCE&G for the Recovery of the Fuel Costs)
Associated with Its Service to Retail)
Electric Customers)

1. Who possesses any requested document;
2. Who has reviewed any requested document;
3. The author, recipient and any copyholders of any requested documents;
4. The parties to any covered conversation, if it is a recording or transcript;
5. Who prepared the requested document;
6. The date of the requested document;
7. The type of document; and
8. The type of privilege asserted.

DEFINITIONS

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REQUEST TO PRODUCE

SCEUC 1.1 Please provide all workpapers used by the Company to develop its request in this proceeding.

SCEUC 1.2 Please provide any and all workpapers and/or worksheets identified in, set forth in, described in or relied upon by the Company in responding to the Intervenor’s interrogatories.

SCEUC 1.3 Please provide all responses to the data requests of the ORS and any other party to this docket.



Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205
803-771-0555
803-771-8010

Columbia, SC

September 2, 2008

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: South Carolina Electric & Gas Company Application for
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DOCKET NO.: 2008-302-E

PARTIES SERVED:

Nanette S. Edwards, Esquire
Office of Regulatory Staff
P. O. Box 11263
Columbia, SC 29201

Shannon Bowyer Hudson, Esquire
Office of Regulatory Staff
p. o. Box 11263
Columbia, SC 29201

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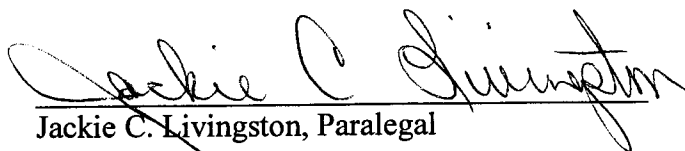
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Washington, DC 20007

E. Wade Mullins, III, Esquire
Bruner Powell Robbins Wall &
Mullins, LLC
P. O. Box 61110
Columbia, SC 29260

PLEADING:

SCEUC's FIRST SET OF REQUEST TO PRODUCE
TO SCE&G

September 2, 2008


Jackie C. Livingston, Paralegal